

In the united States
District Court for the
Western District of Louisiana

Matthew Keith McBride
Plaintiff

vs.

Beauregard Parish
Defendant

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED SHREVEPORT

FEB 21 2013

TONY R. MOORE, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA

complaint

Civil Action No. 2:13-cv-0390
See P.

I.

Jurisdiction & Venue

1. This is a civil action authorized by 42 U.S.C. Section 1983 to redress the deprivation, under color of state law, of rights secured by the Constitution of the United States. The court has Jurisdiction under 28 U.S.C. Section 1331 and 1343(a)(3). Plaintiff seeks declaratory relief pursuant to 28 U.S.C. Section 2201 and 2202. Plaintiff claims for injunctive relief are authorized by 28 U.S.C. Section 2283 & 2284 and Rule 15 of the Federal Rules of Civil Procedure.

2. The western District of Louisiana is an appropriate venue under 28 U.S.C. Section 1391(b)(2) because it is where the events given rise to this claim occurred.

II.

Plaintiff

3. Plaintiff, Matthew Keith McBride, is and was at all times mentioned herein a prisoner of the state of Texas in the custody of the Dallas County Jail in Dallas, Texas, Po Box 4640334 75264

III

Defendant

4) Defendant, Beauregard Parish, of the State of Louisiana.

Beauregard Parish is legally responsible for the overall operation of the drug task force, and all members/employees to Beauregard Parish, and responsible for overall operation on 01/19/2011 or about, State of Louisiana vs. Jeffery Cooley.

IV

Facts

5) Beauregard Parish taskforce and Panola county of Texas both used information/statements given by Dolores Reina to locate a unknown sub. said to be meth, and a handgun under the hood of a car that belonged to Joyce Stein of Mesquite, Tx. after Dolores Reina was given the chance to obtain phone calls to deputy Paul Reyna of Dallas county sheriff office Dolores Reina changed the first statement given to adjusted statements protecting her from being charged with any thing other than the marij. she had in her purse. Dolores Reina gave details of the drug deals she took part of and gave names of a number of people. Photos of Dolores and Jeffery Cooley was found that placed the sum of money in her hands and knowledgement of the amount by her on photo counting the money. Photo was also found of Dolores pointing the gun found by Panola county at a named subject. Dolores Reina was never charged by Panola county on 01/17/2011 for any of the issues other than the small amount of marij. found on or about her person. After the phone call ^{w/} her brother deputy Paul Reyna she agreed to give location where the photos of her ^{w/} the money and gun was taken, she told Panola county

Sheriff and deputy the G.P.S. would have location they needed to confirm her story. Panola county deputy & Sheriff contacted the State taskforce of Louisiana and confirmed the locations, and names given by Dolores Reina. Louisiana taskforce came to the State of Texas and started the plans of making a deal w/ the Sheriff and unknown informant, and w/ in a matter of a couple hours they took that plan into action. Note NCIC will disclose Matthew McBride 01/18/1978 was on probation in Dallas county Texas in the 194th court of Dallas. Panola county of Texas, and Beauregard both requested Matthew McBride to take the charges for Dolores since her brother Paul Reyna would come under fire if she was named, they had more than they needed to convict Dolores for all charges but Matthew was able to consider helping after the facts of Jeffery Cooley was exposed as a Sex offender, and a number of other things to make Matthew McBride take the burden off Dolores Reina that was (7) months prego at the time. Matthew McBride was told Paul Reyna would have probation under control in Dallas County and Panola would dismiss all charges if they got help from Matthew to detain Jeffery Cooley. Matthew McBride was almost dead just hours before in Panola county from a overdose of a number of drugs that was given by unknown means. Matthew knowledged taking (1) or 2) "bars", not every thing found in his system. Regardless Matthew agreed to protect Paul Reyna and Dolores Reina by doing every thing asked even knowing the results could cause future harm and danger to Matthew McBride.

Panola County agreed along with Beauregard Parish to protect, or make statements to support me for my noble service to the state of Louisiana. Matthew allowed the film of a drug deal between Jeffery Cooley and Matthew McBride take place. Please notice the film of Jeffery Cooley giving a sum of money to Matthew McBride, no doubt after research of color of law would anybody agree that means of obtaining the purchase on film was legal. Me not able to witness, and not a official brings grounds to prove the attempt to bring more charges on me there in the state of Louisiana, but I agreed and yet to question. Since that deal countless issues has come my way. Cartel members attempted to keep me on their side but was making plots to get me knocked off. My attorney Hank Juden III charged me \$25,000.⁰⁰ total, \$10,000.⁰⁰ for probation in Dallas county, and 15,000.⁰⁰ for panola county. Mr. Hank Juden III has yet to get paid because of all the problems thats came along with this whole issue. 194th was never fully aware of my services so they refuse to acknowledge my reasons for the drama going on w/ my family and ofcourse Paul Reyna not agreeing to acknowledge my noble act, nor will Panola County acknowledge. I have no access to funds for due process, counsel, and cant site every state/federal law broken w/ every thing so my faith in the federal courts to help me obtain every aspect of records/documents w/ my name Matthew McBride, and all photos taken from the cell phone of mine w/ the photos of Jeffery and Dolores counting the money, and her pointing the

gun. Many details of information/records has been misused to publish my name in Texas to cover Dolores and Paul from ever being apart of any of this. 2 attempts to kill me by gunfire since the day of 5/17/2011 has truly caused me many problems (mental) P.T.S.D. and just unhealth thoughts all around.

6) I filed on Panola County aswell for relief of their probation imposed before all my research to see all this was total official misconduct on everybodys part w/ knowledge of the Federal and state law. 194th county court would like to see these facts proven before given me relief aswell.

7) My attorney Hank Juden III 8111 Preston rd Dallas Texas 75225 has become upset w/ me for the sum of money owed to him for helping me get the probation in Panola county. With all these photo's and facts from Beauregard Parish he would not have had to put forth so much work.

8) My services to that state was agreed because of fear/pressure. I still took all charges and posted bond not P.R., total \$35,000.⁰⁰ plus have 18 months of jail time for probation violation in Dallas, for taking the charges that could have been dismissed w/ due process of all records and facts needed.

Paul Reyna wont except details of the truth about my service agreement there, and in Texas so once some acknowledgment comes from By means of Beauregard Paris

with documents of proof I can get some relief and return to a normal life. Under federal and state laws there's so many law's been broken here that its hard for me to even try to start, and no access to pay for legal help much needed.

9) 11/02/2012 I was told Dolores and my kids was held hostage by cartel members for her actions there and w/ Panola County Sheriff. I was attempting to chase the truck she was said to have but later found out she sold the truck for drugs the ~~the~~ day before and the drug dealer was running from me as I follow on my motorcycle. Not pulling over for the county Sheriff because I was attempting to stay behind them I obtain charges of evading arrest but the court will soon see these complex details and acknowledge I was telling truth.

V.

Legal Claims

10) Plaintiff reallege and incorporate by reference paragraphs 1-10

11) due process, cruel and unusual ~~as~~ punishment has just to claim, Eighth and fourteenth violation of the united States Constitution.

12). The plaintiff has no plain, adequate or complete remedy at law to redress the wrongs described herein. Plaintiff has been and will continue to be irreparably injured by the conduct of the defendants unless this court grants the declaratory and injunctive relief which plaintiff seeks.

VI

Prayer for relief

wherefore, plaintiff ~~pes~~ respectfully prays that this court enter judgement granting plaintiff:

13) A declaration that the acts and omissions described herein violated plaintiff's rights under the constitution and laws of the United States.

14) A preliminary and permanent injunction ordering defendants Beauregard Parish to disclose every document Matthew Keith McBride 1/18/1978 signed on 01/19/2011 or about that's linked to Jeffery Cooley of Singer Louisiana.

All photos from Matthews cell phone used to text and call Jeffery Cooley to lure Mr. Cooley to the hotel in DeBidder to purchase the (meth).

Just a acknowledgment of services fulfilled to the request of Parola county and Beauregard Parish liked agreed by both partys.

Also acknowledge my attemp to request some service of protection by means of support ^{with} any federal aids to help

relieve myself from harms way.

Sending me your acknowledgements will help me ^{w/} relief from the issue going on ^{w/} the hostage & kidnapping hoax put before me to lead to my arrest for chasing the truck ^{w/} what was said to have my kids in there.

Matthew McBride & Hank Juden III could both use this letter of acknowledgment to maybe take before the 194th court for due process.

A jury trial on all issues triable by jury.

Plaintiff's cost in this suit

Any additional relief this court deems Just, proper, and equitable.

Dated: 02/16/2013 Matthew McBride

Respectfully submitted,

Matthew Keith McBride

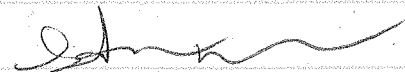
P.O. Box 660334

Dallas, Texas 75266

Verification

I have read the foregoing complaint and hereby verify that the matters alleged therein are true, except as to matters alleged on info and belief, and, as to those, I believe them to be true. I certify under penalty of perjury that foregoing is true & correct.

Executed at Dallas Texas 02/17/2013 :



To: U.S. District Clerk
Western District of Louisiana

U.S. DISTRICT COURT
WESTERN DISTRICT OF LOUISIANA
RECEIVED SHREVEPORT

02/16/2013

FEB 21 2013

TONY B. MOORE, CLERK
WESTERN DISTRICT OF LOUISIANA
SHREVEPORT, LOUISIANA

Thank you for filed and copy of my complaint w/in this package. Sorry if the complaint only is not ~~ang~~ enough to obtain a cause and file to proceed in Forma Pauperis. The Tyler Division in Eastern District of Texas has Forma Pauperis of mine if you wish to request that from them.

Do to the lack of access to legal law library I am unable to obtain the nessary address to contact Beauregard Parish by mail. Please enclose their mailing address when you return my filed copy of this complaint.

I need any documents and rules that would help me with getting this case started, and ofcourse a cause number. Process of service is w/in here aswell please send that along w/ my complaint to Beauregard Parish Criminal court.

Thank you so much for your time to deal w/ this issue.

Respectfully,
M. McBride

Matthew McBride 12073357

P.O. Box 660334,

Dallas, Texas 75266